1	Scott E. Gizer, Esq., Nevada Bar No. 12216  sgizer@earlysullivan.com Sophia S. Lau, Esq., Nevada Bar No. 13365	
2		
3	slau@earlysullivan.com EARLY SULLIVAN WRIGHT	
4	GIZER & McRAE LLP 8716 Spanish Ridge Avenue, Suite 105 Las Vegas, Nevada 89148	
5	Telephone: (702) 331-7593 Facsimile: (702) 331-1652	
6	Kevin S. Sinclair, State Bar Number 12277	
7	ksinclair@sinclairbraun.com SINCLAIR BRAUN LLP	
8	16501 Ventura Blvd, Suite 400 Encino, California 91436	
9	Telephone: (213) 429-6100 Facsimile: (213) 429-6101	
10	Attorneys for Defendant	
11	COMMONWEALTH LAND TITLE INSURANCE COMPANY	
12	DESIGNATED LOCAL COUNSEL FOR SERVICE OF PROCESS ON SINCLAIR BRAUN LLP PER L.R. IA 11-1(b)	
13	Gary L. Compton, State Bar No. 1652	
14	2950 E. Flamingo Road, Suite L Las Vegas, Nevada 89121	
15	UNITED STATES	DISTRICT COURT
16	DISTRICT OF NEVADA	
17	DEUTSCHE BANK NATIONAL TRUST	Case No.: 2:20-CV-01885-APG-VCF
18	COMPANY,	STIPULATION FOR EXTENSION OF
19	Plaintiff,	TIME TO RESPOND TO OPPOSITIONS TO MOTIONS TO
20	VS.	DISMISS AND COUNTERMOTION FOR PARTIAL SUMMARY
21	FIDELITY NATIONAL TITLE GROUP, INC. et al.,	JUDGMENT (ECF No. 22, 24, 25)
22 23	Defendants.	(FIRST REQUEST)
24		
25	COMES NOW defendant Commonwealth Land Title Insurance Company	
26	("Commonwealth") and plaintiff Deutsche Bank National Trust Company ("Deutsche Bank"), by	
27	and through their respective attorneys of record, hereby agree and stipulate as follows:	
20	1. On October 13, 2020, Commonwo	ealth and fellow defendant Fidelity National Title

Group Inc. ("FNTG") filed their motions to dismiss (ECF No. 4, 5.);

- 2. On November 30, 2020 Deutsche Bank filed its response to Commonwealth and FNTG's motions (ECF Nos. 22, 24) and filed a countermotion for partial summary judgment (ECF No. 25);
- 3. Commonwealth and FNTG's deadline to respond to the oppositions to the motions to dismiss and countermotion for partial summary judgment is currently December 7, 2020;
- 4. Commonwealth and FNTG request a brief extension of time to respond to the various motions, until December 21, 2020, to afford Commonwealth and FNTG additional time to respond to the legal arguments set forth in Deutsche Bank's motions;
  - 5. Deutsche Bank does not oppose the requested extension;

11	//
12	//
13	//
14	//
15	//
16	//
17	//
18	//
19	//
20	//
21	//
22	//
23	//
24	//
25	//
26	//
27	//
	1

1

2

3

4

5

6

7

8

9

10



1	6. This is the first request for an	extension which is made in good faith and not for
2	purposes of delay;	
3	IT IS SO STIPULATED that Commonwealth and FNTG's deadline to respond to	
4	Deutsche Bank's oppositions to the motions to dismiss (ECF Nos. 22, 24) and countermotion for	
5	partial summary judgment (ECF No. 25) is h	ereby extended through and including December 21,
6	2020.	
7		
8	Dated: December 1, 2020	SINCLAIR BRAUN LLP
9		
10		By: <u>/s/-Kevin S. Sinclair</u> KEVIN S. SINCLAIR
11		Attorneys for Defendant COMMONWEALTH LAND TITLE
12		INSURANCE COMPANY
13	Dated: December 1, 2020	WRIGHT FINLAY & ZAK, LLP
14		
15		By: /s/-Darren T. Brenner
16		DARREN T. BRENNER Attorneys for Plaintiff
17		DEUTSCHE BANK NATIONAL TRUST COMPANY
18	IT IS SO ORDERED.	
19	Dated this 2nd day of December	, 2020.
20		al
21		ANDREW P. GORDON UNITED STATES DISTRICT JUDGE
22		UNITED STATES DISTRICT JUDGE
23		
24		
25		
26		
27		
28		

